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Alice Glasner  
California Public Utilities Commission  
505 Van Ness Avenue  
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August 18, 2017

**RE: CHARGEPOINT COMMENTS ON THE CPUC/CEC JOINT STAFF DRAFT PROPOSAL SB 350  
DISADVANTAGED COMMUNITIES ADVISORY GROUP STRUCTURE AND FRAMEWORK**

**I. INTRODUCTION**

ChargePoint respectfully submits these comments in regards to the August 1, 2017 California Public Utilities Commission (CPUC) and California Energy Commission (CEC) joint agency staff proposal to establish the Disadvantaged Communities Advisory Group pursuant to SB 350.

ChargePoint is the largest electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 39,000 independently owned charging spots and more than 7,000 customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every category. Leading EV hardware makers, automakers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 26 million charging sessions, saving upwards of 26 million gallons of gasoline and driving more than 636 million gas-free miles.

## II. DISCUSSION

The following are ChargePoint's comments and responses to the questions posed in the joint proposal.

*1. In what ways should the Straw Proposal be modified to better align with the mandates of SB 350, including PU Code 400, PU Code 454.52(a)(1), PU Code 740.8, and PU Code 740.12(a)(1) and other mandates related to disadvantaged communities?*

ChargePoint does not have any specific modifications to recommend on the general structure and framework of the Straw Proposal. However, as we will address in the responses below, we would like to ensure that there is adequate engagement from industry stakeholders and technology providers with the Disadvantaged Communities Advisory Group.

*2. Are there other ways in which the Disadvantaged Communities Advisory Group can provide advice to CPUC and CEC (e.g., informal written comments to the CPUC and CEC, providing reports to the CPUC and CEC, etc.)?*

ChargePoint recommends that the Disadvantaged Communities Advisory Group create a schedule of workshops and community outreach events throughout the state where members of disadvantaged communities can directly engage on these issues and provide input on the impact of these programs to local residents and businesses. This will allow the Disadvantaged Communities Advisory Group to provide direct, community-sourced feedback to CPUC and CEC on the implementation of the various SB 350 programs and initiatives.



*3. Are there specific programs and policy areas related to SB 350 which the Disadvantaged Communities Advisory Group should focus on? If so, please name.*

ChargePoint feels strongly that the Investor-Owned Utilities (IOUs) transportation electrification applications, filed pursuant to SB 350, should be a key focus area to ensure that these efforts are providing direct benefits to disadvantaged communities. Widespread transportation electrification is a vital component of SB 350, and there has not yet been as robust a focus and programmatic experience with disadvantaged community engagement in comparison to existing programs that serve disadvantaged communities and low-income households for energy efficiency and distributed energy resources. This is why it will be important to have transportation electrification efforts be a central focus of the Disadvantaged Communities Advisory Group.

*4. In light of Disadvantaged Communities Advisory Group's responsibility to review SB 350 programs, are there additional areas of knowledge or expertise that should be sought in candidates beyond those described on page three?*

ChargePoint recommends that the selected Advisory Group members be informed about available technologies and industry trends related to transportation electrification, renewable energy, research and development investments, and integrated resource planning. Additionally, ChargePoint feels that it would be valuable if the members have regular interaction with local industry to learn about barriers to market entry as well as ways to encourage market proliferation to bring the benefits of clean energy technologies to disadvantaged communities.

*5. The Advisory Group may review technical information regarding proceedings and programs related to integrated resource planning, transportation electrification, and other clean energy technologies. Should prospective members be recruited who have an interest or background/experience in one or more of the following subject areas? Explain your response.*

- a. Clean energy technologies, such as distributed generation, energy efficiency, renewables, etc.*
- b. Transportation electrification;*
- c. Electric or Natural Gas resource planning;*
- d. Local economics (including job and training potential) with respect to clean energy development;*
- e. Air quality and related health impacts; or*
- f. Greenhouse gas and/or air pollutant controls from a technical or policy perspective.*

All of the above subject areas would be helpful for Advisory Group members to be familiar with, but in particular, Advisory Group members should be interested in as well as have background and experience in transportation electrification. In addition to the widespread transportation electrification goals in SB 350, meeting Governor Brown's Executive Order to help bring 1.5 million zero emission vehicles on California's roads by 2025 will take special focus from the Disadvantaged Communities Advisory Group to make sure that the benefits of this goal are realized equitably across California. Moreover, according to the Air Resources Board, the transportation sector is currently the number one contributor of carbon emissions in California.<sup>1</sup> Therefore, California will need to focus more than ever on removing carbon emissions from the transportation sector to reach its aggressive climate goals. Lastly, due to the large proportion of Volkswagen Settlement funds being allocated in California, there will be significant public investment being directed to California in the coming months and years. It is imperative that the promised 35% of the funding being assigned towards disadvantaged

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<sup>1</sup> <https://www.arb.ca.gov/cc/inventory/data/data.htm>



communities happens. This will require attention and coordination from the Disadvantaged Communities Advisory Board in regards to how this investment aligns with the goals of SB 350.

*6. Are there any other subject area backgrounds that the Commissions should seek out in prospective applicants?*

An additional consideration for member background is knowledge of utility programs related to the subject areas listed in question number five.

*7. Should the Advisory Group charter assign specific roles to the eleven 4 member positions based on policy, issue or geographic areas, such as "air quality/health impacts designee" or "transportation electrification designee"?*

ChargePoint feels that because Advisory Group members will be representatives of specific disadvantaged communities, it could be limiting if they also have a specific subject area. It would be possible that they would only be able to speak about a specific subject area affecting one geographic region. Therefore, ChargePoint recommends that either Advisory Group members represent one geographic region and are familiar with all subject areas, or that an expert of a subject area is selected that can speak to the status of that subject area in several California geographic regions.

*8. Should any leadership positions be designated in the Group's charter, other than Chair, and Secretary? Should the officers' roles be assigned to particular specialties or represented particular communities, rather than be open to any interested members? Are there additional responsibilities desired for each position?*

For an eleven-person Advisory Board, ChargePoint sees no need to assign additional leadership roles beyond the Chair and Secretary. Additionally, as discussed above, ChargePoint recommends that either Advisory Group members represent one geographic region and are familiar with all subject areas or that an expert of a subject area is selected that can speak to the status of that subject area in several California geographic regions.

*9. If the CPUC and CEC cannot find willing candidates with the desired qualifications, how should they proceed to establish the Advisory Group?*

If the CPUC and CEC cannot find willing candidates with the desired qualifications, ChargePoint recommends that they reach out to other stakeholders, including industry representatives, to source individuals that would be suitable for an Advisory Group member role.

*10. How can the work of the Disadvantaged Communities Advisory Group and the Low Income Oversight Board (LIOB) be best coordinated?*

The Disadvantaged Communities Advisory Group and Low Income Oversight Board (LIOB) should make sure that public meetings, webinars, and calls do not have scheduling conflicts so that stakeholders for both organizations can attend all meetings of interest. The Disadvantaged Communities Advisory Group and LIOB should stay in close communication to make sure that they do not make conflicting suggestions to state agencies. The Disadvantaged Communities



Advisory Group and LIOB should make sure that they represent, collectively, disadvantaged communities from across California.

*11. How can the work of the Disadvantaged Communities Advisory Group and the Air Resources Board's Environmental Justice Advisory Committee be best coordinated?*

ChargePoint would recommend the same coordination and structure between the Disadvantaged Communities Advisory Group and the LIOB for how the working group will interact with the Air Resources Board's Environmental Justice Advisory Committee.

### **III. CONCLUSION**

ChargePoint appreciates the opportunity to submit these comments and looks forward to continuing to work with the Public Utilities Commission, and Energy Commission, as well as other stakeholders in order to support the goals of SB 350, specifically increasing the benefits, access, and affordability of clean energy technologies for disadvantaged communities.

Respectfully submitted,

A handwritten signature in black ink that reads "Anne Smart". The signature is written in a cursive, flowing style.

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